

CONSTANCE LEA HEMP,  
infant, by JANICE A. CRONE,  
Mother and Next Friend

:

IN THE CIRCUIT COURT

:

FOR FREDERICK COUNTY

VS.

:

MARYLAND

BESSIE JANE HEMP,  
individually and as  
Administratrix of the  
estate of ARLINGTON EDWIN  
HEMP, deceased

:

NO. 18918 EQUITY

:

: : :

TO THE HONORABLE, THE JUDGES OF SAID COURT:

The Bill of Complaint of Constance Lea Hemp, infant, by Janice A. Crone, mother and next friend of the said Constance Lea Hemp, by Richard E. Zimmerman and Byron W. Thompson, her solicitors, respectively, shows:

FIRST: That the Complainant, Constance Lea Hemp, is the infant daughter of Arlington Edwin Hemp, deceased, late of Frederick County, Maryland.

SECOND: That the said Arlington Edwin Hemp departed this life on or about August 10, 1957 intestate, survived by his widow, Bessie Jane Hemp, in addition to the Complainant, Constance Lea Hemp.

THIRD: That Letters of Administration have been granted for the estate of the said Arlington Edwin Hemp, deceased, by the Orphans Court of Frederick County, Maryland, to his widow, the said Bessie Jane Hemp, who resides at R.F.D. #5, Frederick, Maryland, who has qualified as Administrator of said estate by filing a duly approved Bond.

FOURTH: That the said Arlington Edwin Hemp at the time of his death as aforesaid was seized and possessed of all that parcel of land situate, lying and being in Braddock Election District, Frederick County, Maryland along or near the north side of U.S. Route #40 containing 1 acre, more or less and improved by a 3-room Bungalow and outbuildings and being the same land and premises described in a deed to the said Arlington E. Hemp from Luther R. Hines and Dorothy A. Hines, his wife, dated June 25, 1949, and recorded in Liber No. 479, Folio 392, one of the Land Records of Frederick County, a certified copy of which said deed is filed herewith as "Exhibit No. 1" and prayed to be taken and considered as a part of this Bill of Complaint.